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Via Electronic Comment Filing Submission (ECFS)

August 23, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications
Commission 445 12th Street, S.W.
Washington, D.C. 20554

RE: BCN Telecom, Inc., Assignor and Network Billing Systems, LLC For Grant of Authority Pursuant to Section 214 of the Communications Act of 1934, as Amended and Sections 63.04 and 63.24 of the Commission's Rules to Complete Assignment of Assets Between Authorized Domestic and International Section 214 Carriers, WC Docket No. 17-203

Dear Secretary Dortch:

Pursuant to the assigned attorney's August 17, 2017 request for additional information regarding Network Billing System, LLC ("NBS") ownership in the above referenced matter,¹ NBS responds as follows.

The assigned attorney has requested that NBS identify "any remaining persons or entities who own or control a 10% or more stake in Fusion Telecommunications International (FTI), along with the citizenship of each such person/entity, or clarify that there are no additional entities who own/control 10% or more of FTI." NBS clarifies that there are no other owners with more than 10% of Fusion. Fusion is a public company with many smaller shareholders.

BCN Telecom, Inc. has responded to the assigned attorney's inquiry regarding its ownership separately.

¹ Email from Alexis Johns to Jon Kaufman, Richard Schmeling, Patrick Crocker and Andrew Isar re: Section 214 Domestic Transfer of Control Application: BCN Telecom Inc-Network Billing Systems, LLC (August 18, 2017).

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Thank you for your attention to this matter. Questions may be directed to the undersigned.

Sincerely,

MILLER ISAR, INC.

/s/ Andrew O. Isar

Andrew O. Isar

Regulatory Consultants to
Network Billing Systems, LLC

cc: Alexis Johns (via Email)
Denis Johnson (via Email)
Tracey Wilson (via Email)
Myrva Charles (via Email)